

AO 88 (Rev. 11/91) Summons in a Civil Action

**UNITED STATES DISTRICT COURT**

**FOR THE EASTERN DISTRICT OF NEW YORK**

**SUMMONS IN A CIVIL ACTION**

**United States of America**  
**c/o SHARINN & LIPSHIE, P.C.**  
**Attorneys at Law**

**Case Number:**

**Claim No. C99-98147**

**CV 00 2950**

**200 GARDEN CITY PLAZA**  
**SUITE 506**  
**GARDEN CITY, NY 11530-3209**

**v.**

**RENIECE B. PALMER**  
**2048 RICHMOND AVE.**  
**STATEN ISLAND, NY 10314**

**TRAGER, J.**

**GOLD, M.J.**

**TO:** (Name and Address of Defendant)

**RENIECE B. PALMER**  
**2048 RICHMOND AVE.**  
**STATEN ISLAND, NY 10314**

**YOU ARE HEREBY SUMMONED** and required to file with the Clerk of this Court and serve upon

**PLAINTIFF'S ATTORNEY** (Name and Address)  
**SHARINN & LIPSHIE, P.C.**  
**Attorneys at Law**  
**200 GARDEN CITY PLAZA**  
**SUITE 506**  
**GARDEN CITY, NY 11530-3209**

**an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.**

**MAY 31 2000**

**DATE**

**V.**

**CLERK**

**Robert C. Heinemann**  
**BY DEPUTY CLERK**

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK  
GARDEN CITY DIVISION

CV 00 2950

Claim No: C99-08147

UNITED STATES OF AMERICA

vs.

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TRAGER, J.

GOLD, M.J.

RENIECE B. PALMER

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COMPLAINT

TO THE HONORABLE UNITED STATES DISTRICT COURT JUDGE:

The United States of America, plaintiff, alleges that:

Jurisdiction

1. This Court has jurisdiction over the subject matter of this action pursuant to Article III, Section 2, U.S. Constitution and 28 U.S.C. § 1345.

Venue

2. The defendant is a resident of Eastern District of , New York within the jurisdiction of this Court and may be served with service of process at 2048 Richmond Ave., Staten Island, NY 10314.

The Debt

3. The debt owed the USA is as follows:

A. Current Principal ( <i>after application of all prior payments, credits, and offsets</i> )	\$2625.00
B. Current Capitalized Interest Balance and Accrued Interest	\$539.12
C. Administrative Fee, Costs, Penalties	\$15.00
<b>Total Owed</b>	<b>\$3179.12</b>

FILED  
IN CLERKS OFFICE  
U.S. DISTRICT COURT ED. N.Y.  
MAY 30 2000  
F.M.  
TIME A.M.

↓ (signature)

The Certificate of Indebtedness, attached as Exhibit A", shows the total owed excluding attorney's fees and CIF charges. The principal balance and the interest balance shown on the Certificate of Indebtedness is correct as of the date of the Certificate of Indebtedness after application of all prior payments, credits, and offsets. Prejudgment interest accrues at the rate of 8.250% per annum.

**Failure to Pay**

4. Demand has been made upon the defendant for payment of the indebtedness, and the defendant has neglected and refused to pay the same.

WHEREFORE, USA prays for judgment:

A. For the sums set forth in paragraph 3 above, plus prejudgment interest through the date of judgment, all administrative costs allowed by law, and post-judgment interest pursuant to 28 U.S.C. § 1961 that interest on the judgment be at the legal rate until paid in full;

B. For attorneys' fees to the extent allowed by law; and,

C. For such other relief which the Court deems proper.

Respectfully submitted,

Robert C. Heinemann  
Clerk

By: 

Harvey Sharinn  
Howard S Dworkin  
200 Garden City Plaza  
Suite 506  
Garden City, NY 11530-3209  
Tel No. (516) 873-6600  
Fax No. (516)294-0152  
Attorneys for Plaintiff

U. S. DEPARTMENT OF EDUCATION  
SAN FRANCISCO, CALIFORNIA

CERTIFICATE OF INDEBTEDNESS

Reniece B. Palmer  
AKA: Reniece Brent Palmer  
2048 Richmond Ave.  
Staten Island, NY 10314

SSN: 122-72-9444

I certify that Department of Education records show that the borrower named above is indebted to the United States in the amount stated below plus additional interest from 04/27/99.

On or about 10/10/96, the borrower executed promissory note(s) to secure loan(s) of \$2625.00 from U.S. Department of Education, Washington, D.C. The loan was made by the Department under the William D. Ford Federal Direct Loan Program under Title IV, Part D of the Higher Education Act of 1965, as amended, 20 U.S.C. 1087a et. seq (34 C.F.R. Part 685). The Department demanded payment according to the terms of the note(s), and the borrower defaulted on the obligation on 12/16/97. The Department has credited \$ 0.00 from all sources, including Treasury Department offsets, if any to the balance. After application of these payments, the borrower now owes the United States the following:

Principal:	\$2625.00
Interest:	\$305.94
Administrative/Collection Cost:	\$0.00
Late fees:	\$0.00

Total Debt as of 04/27/99:	\$2930.94
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Interest accrues on the principal shown here at the rate of 8.25 % per annum and a daily rate of \$0.59.

Pursuant to 28 U.S.C. Section 1746(2), I certify under penalty of perjury that the foregoing is true and correct.

Executed on: 5-11-99

Name: Janet Cummins  
Title: Loan Analyst  
Branch: Litigation Branch  
Janet Cummins  
Senior Loan Analyst